

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

A.S.R., individually and on behalf of all others
similarly situated

Petitioner–Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Respondents–Defendants.

Case No. 3:25-cv-00113

MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff-Petitioner, A.S.R., on behalf of the putative class of Venezuelans who were detained at Moshannon as of Tuesday morning, April 15, but specifically F.R.C-C (whose name has been shared with government’s counsel in this case), moves this court to enter another TRO specifically prohibiting Respondents from removing either of the two identified petitioners or any others similarly situated, out of the country, and as grounds therefor aver as follows:

1. Credible information is available that Respondents will imminently load a plane from Bluebonnet detention center in Texas, full of Venezuelan detainees, on a flight to El Salvador.

2. Upon information and belief, the Pennsylvania-based petitioners are on, or will be on, that flight.

3. Undersigned counsel has asked the government’s attorneys to confirm that these people will not be removed. See attached. Undersigned has received no response from Respondents’ counsel.

WHEREFORE, Petitioners respectfully request that this Court issue an immediate TRO clarifying that no person removed from Moshannon this past Tuesday may be removed from the country.

Dated: April 18, 2025

Respectfully submitted,

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**Pro hac vice applications forthcoming*
***Admitted pro hac vice*